Docket #0077 Date Filed: 4/24/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: HUDSON 1701/1706, LLC, *et al.*,[1] Debtors.	Chapter 11 Case No. 25-11853 (KBO) (Jointly Administered)
HUDSON 1701/1706, LLC, a Delaware limited liability company; and HUDSON 1702, LLC, a Delaware limited liability company, Plaintiffs, -v- 356W58 GROUND LESSOR LLC, a Delaware limited liability company, Defendant.	Adv. Proc. No. 25-52471 (KBO)

NOTICE OF INTENT TO SERVE SUBPOENA ON NON-PARTY

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 45, made applicable to this proceeding by Rule 9016 of the Federal Rules of Bankruptcy Procedure, counsel for Defendant 356W58 Ground Lessor LLC, in the above-captioned adversary proceeding, will cause the subpoena to testify at a deposition attached hereto as **Exhibit 1** to be served upon Parkview Financial, LLC.

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Hudson 1701/1706, LLC (0281) and Hudson 1702, LLC (0190). The Debtors' headquarters and the mailing address for the Debtors is 11440 San Vicente Boulevard, 2nd Floor, Los Angeles, CA 90045.

25118532606110000000000014

Dated: April 24, 2026
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Katherine S. Dute

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT

District of Delaware

In re Hudson 1701/1706, LLC, et al.
Debtor

Case No. 25-11853

(Complete if issued in an adversary proceeding)

Chapter 11

Hudson 1701/1706 LLC
Plaintiff

v.

Adv. Proc. No. 25-52471

356W58 Ground Lessor LLC
Defendant

SUBPOENA TO TESTIFY AT A DEPOSITION IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Parkview Financial, LLC, 11440 San Vicente Blvd, 2nd Floor, Los Angeles, CA 90049
(Name of person to whom the subpoena is directed)

☒ *Testimony*: **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this bankruptcy case (or adversary proceeding). If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment: See Attachment A

PLACE	DATE AND TIME
Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, DE 19899 or an agreed upon location	May 1, 2026

The deposition will be recorded by this method:
The deposition will be conducted before a notary public or other person authorized to administer oaths and will be recorded by stenographic, audio, video and/or real-time transcription means.

☐ *Production*: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: April 24, 2026

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/ Matthew B. McGuire
Attorney's signature

The name, address, email address, and telephone number of the attorney representing *(name of party)* 356W58 Ground Lessor LLC, who issues or requests this subpoena, are: Matthew B. McGuire, Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, DE 19899, (302)-467-4400, mcguire@lrclaw.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____
_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____
_____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of $ _____ .

My fees are $ _____ for travel and $_____ for services, for a total of $_____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

…

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

ATTACHMENT A

DEFINITIONS

For the purposes of the Topics, the following terms shall apply:

1. "**And**" and "**or**" shall be construed conjunctively or disjunctively as necessary to bring within the scope of the Topics all Documents or information that might otherwise be construed as outside their scope.

2. "**Any**" means "each and every," "any and all," and "any one."

3. "**Between**" shall include "among" and vice versa.

4. "**Communication**" means the transmission of information in any form and includes without limitation all inquiries, discussions, conversations, presentations, negotiations, agreements, understandings, meetings, telephone conversations, text messages, instant messages, Slack messages, Signal messages, Telegram messages, WhatsApp messages, iMessages, e-mails, social media, letters, notes, telegrams, advertisements, correspondence, memoranda, or other forms of verbal, written, or electronic intercourse, including drafts, facsimiles and copies, as well as originals. The term "Communication" is not limited to internal Communications.

5. "**Complaint**" shall mean the complaint filed in the above captioned adversary proceeding at *Complaint*, Case No. 25-52471 [D.I. 1].

6. The term "concerning" is to be understood in its broadest sense and means concerning, constituting, identifying, evidencing, summarizing, commenting upon, referring to, relating to, arising out of, describing, digesting, reporting, listing, analyzing, studying, discussing, stating, setting forth, reflecting, interpreting, recording, including, negating, manifesting, containing, or comprising the subject matter identified.

7. "**Debtors**" means, collectively, Hudson 1701/1706, LLC and Hudson 1702, LLC, which filed voluntary chapter 11 petitions under title 11 of the United States Code, 11 U.S.C. §§ 101–1532 and commenced the above-captioned chapter 11 cases.

8. "**Document**" shall have the broadest meaning permitted by Rule 34 of the Federal Rules of Civil Procedure, applicable to this proceeding by Rule 7034 of the Federal Rules of Bankruptcy Procedure, including, but not limited to, any tangible thing upon which any expression, Communication or representation has been recorded by any means including, but not limited to, handwriting, typewriting, printing, photostating, photographing, videotaping, magnetic impulse, text messaging, instant messaging, Slack messaging, Signal messaging, Telegram messaging, WhatsApp messaging, iMessaging, e-mailing (whether in a business capacity or personal capacity), social media, computer disks, computer storage drives, computer tapes, or mechanical, electronic, or digital recording or information storage of any kind, and any nonidentical copies (whether different from the original because of notes made on such copies, because of indications that said copies were sent to different individuals than were the originals, or because of any other reason), including but not limited to working papers, preliminary, intermediate, or final drafts, correspondence, memoranda, electronic mail, charts, notes, records of any sort of meetings, financial calculations, diaries, reports of telephone or other oral conversations, desk calendars, appointment books, and all other writings and recordings of every kind that are in Your actual or constructive possession, custody, or control.

9. "**Fourth Amendment**" shall mean *Declaration of Matthew B. McGuire in Support of 356W58 Ground Lessor LLC's Motion to Dismiss Complaint*, Case No. 25-52471 [D.I. 17] at Ex. Q.

10. "**Ground Lease**" that certain lease between Hudson 1701/1706, LLC and Hudson 1702, LLC, and Landlord, dated May 4, 2022.

11. "**Identify**" means (i) in relation to a natural person, to establish a person's identity such that the identity of the person will be ascertainable distinctly from all other like persons, and to provide the person's current or last known employer, current or last known mailing address, and current or last known telephone number; or (ii) in relation to a document or item, to establish the document's or item's identity such that the identity of the document or item will be ascertainable distinctly from all other like documents or items, and to state the name and address of the custodian of the document or item, the location of the document or item, and a general description of the document or item.

12. "**Including**" means "including, but not limited to" and "including, without limitation." It shall not be construed to limit the scope of any definition or Topic herein.

13. "**Landlord**" refers to 356W58 Ground Lessor LLC.

14. "**Parkview**" means Parkview Financial REIT, LP as well as any affiliates, agents, assigns, attorneys, representatives, or any other Persons acting or purporting to act Parkview's' behalf.

15. "**Person**" means, without limitation, natural persons and individuals; sole proprietorships; general and limited partnerships; for-profit and non-profit corporations; unincorporated associations; other business entities; and governments, agents, employees, or instrumentalities of governmental or legal entities. "Person" further includes without limitation "You" as defined below.

16. "**Relating to**" or "**related to**," or any variant thereof, mean without limitation, referring to, concerning, pertaining to, discussing, mentioning, containing, reflecting, constituting,

describing, displaying, showing, identifying, proving, disproving, consisting of, arising out of, supporting, or contradicting.

17. "**You**" or "**Your**" refer collectively to Parkview—as well as any agents, assigns, attorneys, representatives, or any other Persons acting or purporting to act on Your behalf.

18. Whenever necessary to bring Documents or other information within the scope of these Topics that might otherwise be construed to be outside their scope: (i) the use of a verb in any tense shall be construed as the use of that verb in all other tenses; (ii) the use of a word in its singular form shall be deemed to include within its use the plural form as well; and (iii) the use of a word in its plural form shall be deemed to include within its use the singular form as well.

TOPICS OF EXAMINATION

TOPIC NO. 1:

The factors relevant to whether the Ground Lease should be characterized as a lease or a disguised financing, including those referenced in paragraphs 3 and 69-91 of the Complaint.

TOPIC NO. 2:

The facts and circumstances, including all Documents and Communications, of the Debtors (including the proposed conversion project) leading up to the Fourth Amendment.

TOPIC NO. 3:

The benefits and detriments of the Fourth Amendment from Your and/or the Debtors' perspective as of its execution.